

1 posturing, he did accuse me of being difficult. As stated in my previous  
2 declaration, dated January 16, attached:

3 It was about 2p at this point, and Mr. Master stated that I was being  
4 difficult. I wanted to make sure that he understood that I was in no way  
5 being difficult, and was in fact trying to answer all of his questions, with  
6 the best information possible, given the limited answers he was able to  
7 provide to me, while at the same time making sure that his incorrect  
8 misstatements were identified. I asked him to confirm that I had in fact  
9 answered ALL of his questions that he had posed to me up until that  
10 point. He said that there were two lingering questions. He reasked them.  
11 I reanswered them. I then reasked if I had answered ALL of his  
12 questions to this point. His answer was essentially: although he may (or  
13 may not) have some follow-up questions, at some point in the future,  
14 that, at this point, the answer was "Yes." However, he had also stated  
15 that we were just beginning, and that he had many more questions.

16 Then, immediately following his "Yes" answer, I explained that I did  
17 not previously appreciate being accused of being difficult. I requested  
18 that, in order to have a good and clear record of our conversation, so that  
19 any future such allegation could be clearly addressed, that we record the  
20 call from that point forward. Mr. Master then, and extremely abruptly,  
21 without any conversation or dialog, said virtually exactly 4 words: "This  
22 call is terminated," and then hung up.

23 27. It is my understanding that other City employees commonly use Ms.  
24 Kopp's computer, and that Council people have also been allowed to use City  
25 employees' computers. Based on this understanding, it is my opinion that the  
26 computers likely to contain relevant evidence be expanded beyond the simple list  
27 of the 3 names of: Mr. Rice, Mr. Loventhal, and Mr. Wright.  
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1           28. It is my understanding that within the last few days, Mr. Master has  
2 conveyed that he recently learned of issues related to Mr. Loventhal's "old" laptop.  
3 However, I specifically recall from my January 12 conference call, that when this  
4 topic arose during the call, Mr. Master refused to produce this computer. His  
5 refusal was interpreted by me as a familiarity with the computer and a decision to  
6 not produce it, as opposed to his apparently current position that he just learned  
7 about its location.

8           29. In summary, it is my opinion that the ORDER be allowed to stand,  
9 and that the designated forensic experts be allowed to perform the work that the  
10 court has ordered, and that they be granted the latitude consistent with their  
11 extensive experience and expertise, and good judgment to cause the order to be  
12 executed with efficient, dependable, and proven methods and processes.

13           30. Because of the complications that have arisen as a result of Mr.  
14 Master's statements, and those of Mr. Cannon and Ms. L'Heureux, as well as the  
15 contents of my previous declaration, and a possible need for in-person explanations  
16 or clarifications, I offer my availability, on the phone, in chambers, or in court for  
17 any related matter or topic.

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20           I declare under penalty of perjury under the laws of the United States of  
21 America, that the foregoing is true and correct and that this declaration was  
22 executed on February 5, 2007 at Los Angeles, California.

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25           \_\_\_\_\_  
26 Scott Cooper, CMC  
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